

DRAFT

Portable Fuel Container

Errata Sheet

September 2005

ARB staff received several comments from the August 16, 2005 Public Workshop concerning the Portable Fuel Container Regulation Amendments. ARB staff has the following comments and proposed changes in underline and strikeout format:

Comments and proposed changes to the Regulation

It was suggested that the ARB add two definitions to clarify the terms, “automatic closure” and “automatically close”. These terms are used in the Regulation and elsewhere in the certification and test procedures to determine the automatic closure requirement. ARB staff agrees and proposes to add the following:

2467.1(a)(2) “Automatic closure” means a device or mechanism that causes a spill-proof system or spout to close, seal and remain completely closed when not dispensing fuel.

2467.1(a)(3) “Automatically close” means closure occurs through the activation of a device or mechanism that causes a spill-proof system or spout to close, seal, and remain completely closed when not dispensing fuel.

It was suggested that the ARB amend the definition of a “spout” to allow for spout extensions to help fueling applications that would benefit from a longer or more flexible spout tip. The ARB staff agrees and proposed to following change:

2467.1(a)(19) “Spout” means any device that can be firmly attached to a portable fuel container for conducting pouring through which the contents of a portable fuel container can be dispensed, ~~not including a device that can be used to lengthen the spout to~~ accommodate necessary applications.

Comments and proposed changes to the Certification Procedure CP-501

It was suggested that the ARB make changes to CP-501 Table 2-1 to clarify the automatic closure requirement. ARB staff agrees and proposes to changes the Table as follows:

Automatic Closure	Spout automatically closes and seals when removed from tank <u>not dispensing fuel.</u>
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CP-501 Section 2.3(c) allows for portable fuel container products to be tested as a product family under certain situations. It was suggested that the Regulation allow for changes to color as one such situation. ARB staff agrees and proposes:

2.3(c) Portable fuel containers that share similar designs are constructed of identical materials, and that are manufactured using identical processes, but vary only in size or color may be considered for certification as a product family.

CP-501 Section 3.11(b) regulates what product components need to be certified. It was suggested that simple changes to the vendor of a component should not require certification. ARB staff agrees and suggests the following:

3.11(b) If the component(s) design and material specifications requested for inclusion in the certification have not been previously incorporated in a spill-proof system or spill-proof spout that has been issued an executive order pursuant to these procedures, each of the component(s) shall be subject to each of the application and test requirements specified herein.

CP-501 Section 2.8(a) specifies that information concerning the type of equipment the portable fuel container is intended to fuel be included on the operating instructions provide with the portable fuel container sold in California. It was stated that manufacturers of portable fuel container would find it difficult to include all types of equipment their products were intended for and suggested that the Section be changed to require a listing of equipment types that the portable fuel container was specifically not intended to fuel. ARB staff agrees and proposes the following:

2.8(a) A listing of any specific equipment types, such as passenger cars and trucks, lawn and garden equipment, off-road motorcycles and snowmobiles, industrial equipment, and marine vessels that ~~The designed intent of the spill-proof system or spill-proof spout, is not intended and the types of equipment with which it may be used to refuel; and~~

Comments and proposed changes to the Test Procedure TP-501

TP-501 Section 7.3 discusses how certification and enforcement testing shall be conducted to test for the automatic closure requirement. It was

suggest that the language at the top of page 5 could be clarified concerning how the portable fuel container is removed from the test fixture. ARB staff agrees and proposes the following:

At the top of page five of TP-501 Section 7.3 ...~~Lift the container to~~
Engage the automatic closure feature...

Comments and proposed changes to the Test Procedure TP-502

TP-502 Section 3.6 includes a warning about static electricity and an option to discharge the balance to remove the bias. It was suggested that this option be removed. ARB staff disagrees with the suggestion and is not proposing any changes to the Section.

TP-502 Section 7.10(b) includes a 140-day durability test period. It was suggested that the number of days be reduced. ARB staff disagrees with this suggestion. It is necessary to test for the full 140 days to ensure the test identified possible defects.

TP-502 Section 8.1 allows for testing to be done at ambient temperatures. It was suggested that ambient temperature be defined. If ARB staff defined ambient temperature this would increase the cost of the test by requiring daily temperature reading be taken. ARB staff believes this is unnecessary and does not propose any changes.

TP-502 Section 8 allows for testing at elevated temperature without requiring a trip blank. It was suggested that a trip blank should be included. ARB staff agrees with this suggestion and proposes the following:

Section 8. A preconditioning period is required to demonstrate permeation equilibrium. Equilibrium occurs when the container walls have become saturated with fuel. Preconditioning may be combined with the durability demonstration listed above. In order to achieve equilibrium, the container can be soaked with fuel at ambient or elevated temperatures. For elevated temperature soak, a trip blank shall be used for correction of measurements.

TP-502 Section 8.7 requires testing to be done over a 10 consecutive day period. It was suggested that the consecutive day requirement be removed. ARB staff believes this requirement is necessary to ensure accurate test results. ARB staff is not proposing any changes to this Section.